

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LARISSA LARIN  
1006 Beechwood Place  
Warwick, PA 18974,

Plaintiff,

vs.

NORTHSTAR LOCATION SERVICES, LLC  
4285 Genesee Street  
Cheektowaga, NY 14225-1943,

Defendant.

CIVIL ACTION NO.

**COMPLAINT**

**I. INTRODUCTION**

1. This is an action for damages brought by a consumer pursuant to the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 (“FDCPA”).

2. The FDCPA prohibits debt collectors from engaging in deceptive and unfair practices in the collection of consumer debt.

3. Defendant is subject to strict liability for using collection tactics which violate the provisions of the FDCPA.

**II. JURISDICTION**

4. Jurisdiction arises under 15 U.S.C § 1692k and 28 U.S. C. § 1337.

**III. PARTIES**

5. Plaintiff Larissa Larin is a consumer who resides in Warwick, Pennsylvania at the address captioned.

6. Defendant Northstar Location Services, LLC (“Northstar”) is a New York debt collection company with a principal place of business at the address captioned.

7. Northstar regularly does business in the Eastern District of Pennsylvania.

8. Northstar regularly uses the mail and telephone to attempt to collect consumer debts alleged to be due another.

9. Northstar is a “debt collector” as that term is contemplated in the FDCPA, 15 U.S.C. § 1692a(6).

#### **IV. STATEMENT OF CLAIM**

10. In August 2010, defendant Northstar began its campaign to collect a consumer debt alleged due from Plaintiff.

11. As part of its collection campaign, Northstar repeatedly called Plaintiff during the month of August 2010 threatening a lawsuit if she did not pay.

12. Despite its threats of legal action, Northstar did not and has not filed suit on this disputed account.

13. The FDCPA prohibits debt collectors, like Northstar, from making false, deceptive or misleading statements in connection with an account claimed due, including the threat to take action that is not intended to be taken. 15 U.S.C. § 1692e, § 1692e(5), § 1692e(10).

14. From on or about September 2 to September 13, 2010, Northstar also called Plaintiff’s former boyfriend on several occasions in an effort to embarrass, harass, and pressure Plaintiff in connection with the account claimed due.

15. Northstar did not have a valid reason to contact Plaintiff’s former boyfriend as it already had Plaintiff’s location information as evidenced by Northstar’s contact (both in writing and by telephone) with Plaintiff during the months of August and September 2010.

**COUNT I - FAIR DEBT COLLECTION PRACTICES ACT**

16. Plaintiff repeats the allegations contained above as if the same were here set forth at length.

17. The acts by Defendant described above violate the Fair Debt Collection Practices Act in the following ways:

- (a) By using false, deceptive or misleading representations or means in connection with the collection of a debt claimed due, in violation of 15 U.S.C. § 1692e and § 1692e(10);
- (b) By threatening to take any action that cannot legally be taken or that is not intended to be taken, in violation of 15 U.S.C. § 1692e(5);
- (c) By communicating with a third party, in violation of 15 U.S.C. § 1692c; and
- (d) By engaging in conduct, the natural consequence of which was to harass, oppress and intimidate the Plaintiff in an attempt to collect an alleged debt, in violation of 15 U.S.C. § 1692d.

**WHEREFORE**, Plaintiff Larissa Larin demands judgment against Defendant Northstar Location Services, LLC for:

- (a) Damages;
- (b) Attorney's fees and costs;
- (c) Such other and further relief as the Court shall deem just and proper.

V. **DEMAND FOR JURY TRIAL**

Plaintiff demands a trial by jury as to all issues so triable.

Respectfully submitted:

Date: 1/3/10



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